

**IN UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

BRANDY CLINTON AND HELEN KAPLAN,)
Individually and on Behalf of All Other)
Persons Similarly Situated,)
)
Plaintiffs,)
)
v.)
)
GOVERNMENT EMPLOYEES INSURANCE)
)
COMPANY A/K/A GEICO,)
)
Defendant.)

CIVIL ACTION No. 2:16-cv-430 AWA-LRL

**DEFENDANT'S REQUEST FOR HEARING ON PLAINTIFF'S MOTION FOR THE
SENDING OF NOTICE AND FOR CONDITIONAL COLLECTIVE CERTIFICATION,
AND FOR EQUITABLE TOLLING**

Defendant, Government Employees Insurance Company (GEICO), pursuant to Eastern District of Virginia Local Civil Rule 7(E), hereby respectfully requests that Magistrate Judge Lawrence R. Leonard set oral argument on Plaintiffs' Motion For The Sending Of Notice And For Conditional Collective Certification, And For Equitable Tolling, ECF No. 33, which was filed on March 3, 2017. Defendant has conferred with Plaintiffs, and Plaintiffs oppose the request for hearing.

The briefing on the motion is complete, and GEICO believes that oral argument would be useful to the Court in addressing and resolving the Motion.

Date: April 3, 2017

Respectfully submitted,

By: /s/ Sharon S. Goodwyn

Sharon S. Goodwyn (VSB No. 28822)
HUNTON & WILLIAMS, LLP
500 East Main Street, Suite 1000
Norfolk, VA 23510
(757) 640.5300
(757) 625-7720 *facsimile*
sgoodwyn@hunton.com

Eric Hemmendinger (*Pro Hac Vice*)
Lindsey A. White (*Pro Hac Vice*)
SHAWE & ROSENTHAL, LLP
One South Street, Suite 1800
Baltimore, MD 21202
(410) 752-1040
(410) 752-8861 *facsimile*
eh@shawe.com
law@shawe.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was caused to be served this 3rd day of April, 2017 via the transmission of a notice of electronic filing via the Court's ECF system upon the following:

Harris D. Butler, III (harris.butler@butlerroyals.com)
Zev H. Antell (zev.antell@butlerroyals.com)
BUTLER ROYALS, PLC
1409 Virginia Street, Suite 302
Richmond, VA 23219

Reid H. Ervin (rhervin@reidervin.com)
Joshua L. Jewett (jjewett@reidervin.com)
Brittan M. Wrigley (bwrigley@reidervin.com)
REID H. ERVIN & ASSOCIATES, P.C.
999 Waterside Drive, Suite 2400
Norfolk, VA 23510

Attorneys for Plaintiffs

/s/ Sharon S. Goodwyn
Sharon S. Goodwyn (VSB No. 28822)
HUNTON & WILLIAMS LLP
500 East Main Street, Suite 1000
Norfolk, VA 23510
(757) 640-5300
(757) 625-7720 *facsimile*
sgoodwyn@hunton.com

Attorney for Defendant